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Attorneys for Defendant Paulette Krelman

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MERRILL LYNCH BUSINESS FINANCIAL
SERVICES, INC.

Plaintiff,

vs.

ARTHUR KUPPERMAN, E. ROSS
BROWNE, PAULETTE KRELMAN and
PGB INTERNATIONAL, LLC, and
JPMorgan Chase Bank, N.A.

Defendants.

: Civil Action No. 06 Civ. 4802 (DMC)

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: Hon. Dennis M. Cavanaugh, U.S.D.J.

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: **Motion Returnable: December 11, 2006**

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: **NOTICE OF CROSS MOTION TO
DISMISS/FOR SUMMARY JUDGMENT**

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: **Document Electronically Filed**

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TO: George R. Hirsch, Esq.
Bressler, Amery & Ross, P.C.
325 Columbia Turnpike
Florham Park, New Jersey 07932
Counsel for Plaintiff, Merrill Lynch Business Financial Services, Inc.

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Counsel for Defendants, Arthur Kupperman and PGB International, LLC

John M. August, Esq.
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One Gateway Center
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Counsel for JP Morgan Chase Bank, N.A.

SIRS:

PLEASE TAKE NOTICE that on December 11, 2006, at 9:30 a.m. or as soon thereafter as counsel may be heard, defendant, Paulette Krelman, by and through her attorneys, Post, Polak, Goodsell, MacNeill & Strauchler, P.A. (Frederick, B. Polak, Esq. appearing), shall join in the Cross Motion to Dismiss/For Summary Judgment filed by defendants Arthur Kupperman and PGB International, LLC against plaintiff, Merrill Lynch Business Financial Services, Inc. before the Honorable Dennis M. Cavanaugh, U.S.D.J., at the United States Courthouse, 451 U.S. Post Office Courthouse Building, Federal Square, Newark, New Jersey.

PLEASE TAKE FURTHER NOTICE that defendant Paulette Krelman shall rely upon the documents filed by defendants Arthur Kupperman and PGB International, LLC.

POST, POLAK, GOODSSELL, MACNEILL
& STRAUCHLER, P.A.
Attorneys for Defendant Paulette Krelman

November 29, 2006

By: s/Frederick B. Polak
Frederick B. Polak